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FROM: Wesley B. Press, Bureau Chief

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Information Update

February 15, 2002

Update #70

1. Standard Method 9223B, Colilert Quanti-Tray MPN, manufactured by IDEXX Laboratories Inc., was approved by the Director of Arizona Department of Health Services on February 11, 2002, for compliance testing of *E. coli* in wastewater samples. This approval is only applicable for Arizona licensed laboratories when a National Pollutant Discharge Elimination System (NPDES) permit specifies *E. Coli* as a required testing parameter.
2. A reminder: The permitted maximum holding times for coliform analysis are:
 - six hours for wastewater samples
 - eight hours for source water samples
 - thirty hours for drinking water samples.
3. Method 8000B, Revision 2, December 1996, Section 8.2.6.5.1 specifies that the results of a method blank should be "less than the laboratory's Method Detection Limits (MDL) for the analyte or less than the level of acceptable blank contamination specified in the approved quality assurance project plan". ADHS sought input from the EPA's Methods Information Communication Exchange (MICE) service to see if it is acceptable to require the method blank to be less than the minimum reporting limits. The main concern of the MICE service is how the laboratories set the minimum reporting limits. Many times these limits are arbitrarily set without any standardized factor above the calculated MDL. Since our Office requires a calibration standard to be analyzed at or below the minimum reporting limit, MICE recommends that the method blank criteria should be set to less than this calibration standard. With MICE services' recommendation in mind, for 8000 series methods, our Office will accept method blank concentrations reported as less than the low standard of the calibration curve. The low standard should be equal to or below the reporting limit.
4. The residue non-filterable (TSS) methods, EPA 160.2, SM 2540D, and Hach 8158 require a well-mixed representative water sample prior to filtration. The use of a blender is not an acceptable means of producing a well-mixed sample, because the blender modifies the size of the particles. A "well-mixed sample" means to shake the sample for re-suspending the particles. This information was obtained from EPA's Engineering and Analysis Division, Office of Science of Technology,

Office of Water. SM 2540D specifies a magnetic mixer to be used to produce a well-mixed sample.

5. There has been an ongoing discussion between this Office and the licensed laboratories regarding acceptable recoveries for the calibration verification standards on the non-Calibration Check Compounds (CCC) for EPA methods 8260 and 8270. The acceptance criteria are not given for the non-CCC compounds in these methods. When we corresponded with MICE last year on the same subject, their response was that EPA was getting away from CCC and System Performance Check Compounds (SPCC) and they were in the process of revising the methods. The revised methods would have compounds grouped based on their difficulties and would have individual acceptance criteria. They thought the concept of setting in-house limits was good, but the disadvantage was that a laboratory doing poor analytical work would have wider acceptance limits. They also thought setting a straight acceptance limit of 15 or 20% was unreasonable and hard to achieve on the difficult compounds.

The staff at MICE has changed recently. Their response to our recent e-mail was, since 8260B and 8270C have no criteria given for non-CCC and non-SPCC compounds, the 8000B criteria of $\pm 15\%$ would apply. The revisions to these methods were still in the works and they didn't know the completion date.

Our Office will continue to enforce in-house limits until we gather more information. The environmental laboratory licensure rules specify that the laboratories should develop in-house limits if the methods do not have set acceptance requirements. We welcome comments from the licensed laboratories on the impact of enforcing the 8000B criteria. We understand the difficulty in achieving the $\pm 15\%$ recoveries on some of the difficult compounds. Please fax your laboratory's in-house limits for non-CCC compounds for 8260B and 8270C for both water and soil samples. Please fax your response to (602) 364-0758, to the attention of Prabha Acharya. Thank you in advance for taking the time to respond.

6. If you have any questions regarding the Information Updates, or if you have any technical questions that need clarification, please call or send e-mail to Prabha Acharya, Program Manager, Technical Resources and Training, at the Laboratory Licensure numbers/address. Copies of the Information Updates can now be found at our Internet address:
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